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Joint Stipulation to Continue Trial and Related Dates & ORDER

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

## AT SEATTLE

JERRETT RHOADS,

Plaintiff,

v.

UNITED AIRLINES, INC. and CORPORATIONS A-Z,

Defendants.

No. 2:24-cv-00192 JHC

JOINT STIPULATION TO CONTINUE TRIAL AND RELATED DATES & ORDER

NOTE ON MOTION CALENDAR: FEBRUARY 4, 2025

Pursuant to Local Rule W.D. Wash. LCR ("LCR") 7(d)(1), LCR 10(g), and LCR 16(b)(6), counsel for Defendant United Airlines, Inc. ("United") and Plaintiff Jerrett Rhoads ("Rhoads") ("collectively hereby referred to as "the Parties") hereby submit the following Joint Stipulation to Continue Trial and Related Dates, with reference to the following facts:

WHEREAS, Rhoads filed his Complaint for Damages on January 22, 2024, in Washington Superior Court, King County.

WHEREAS, United filed the Notice of Removal to the Western District of Washington on February 12, 2024, which was Granted by this Court.

WHEREAS, the Parties entered into a Joint Stipulation to Continue Trial and Related

Dates, filed on September 9, 2024 (ECF 11).

WHEREAS, this Court Granted the aforementioned Joint Stipulation to Continue Trial and Related Dates and issued a Scheduling Order on September 13, 2024, (ECF 13) setting the following deadlines and Bench Trial in this case:

Amended Pleadings due on 03/24/2025; Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 03/24/2025, Discovery Motions due by 04/23/25, Discovery completed by 05/23/25, Dispositive motions due by 06/23/25, Attorney settlement conference to be held by 08/21/25, Motions in *Limine* due by 09/28/25, Pretrial Order due by 09/26/25, Deposition Designations due by 09/09/25, Pretrial Conference set for 10/01/25 at 01:30 PM in Courtroom 14106 before Judge John H. Chun; Trial briefs to be submitted by 10/14/25, Proposed Findings of Fact and Conclusions of Law to be submitted by 10/14/25; Bench Trial for 10/20/25 at 1:30 p.m.

WHEREAS, the Parties continue to engage in discovery and fact-finding related to Rhoads' claims and United's defenses.

WHEREAS, the Parties continue to engage in good faith settlement discussions with mediation scheduled to occur on March 13, 2025.

WHEREAS, the Parties have met and conferred and hereby stipulate to a 90-day continuance, with some variation to accommodate weekends and holidays, of Bench Trial and extension of all related dates as outlined above.

THEREFORE, the Parties jointly agree as follows:

Amended Pleadings now due on 6/23/2025; Expert Witness Disclosure/Reports under FRCP 26(a)(2) now due by 6/23/2025, Discovery Motions now due by 7/22/2025, Discovery now to be completed by 08/21/2025, Dispositive motions now due by 9/22/2025, Attorney settlement conference now to be held by 11/19/2025, Motions in *Limine* now due by 12/08/2025, Pretrial

Joint Stipulation to Continue
Trial and Related Dates & ORDER

Order now due by 1/09/2026, Deposition Designations now due by 1/12/2026, Pretrial 1 2 Conference to be set for 1/19/2026 at 01:30 PM in Courtroom 14106 before Judge John H. Chun; 3 Trial briefs to now be submitted by 1/27/2026, Proposed Findings of Fact and Conclusions of 4 Law to now be submitted by 1/27/2026; Bench Trial now for 2/03/2026 at 1:30 p.m. 5 ROSEN & SCHNEIDER, LLC<sup>1</sup> Dated: February 4, 2025 6 7 Tabatha M. Schneider, WSBA No. 60508 8 Steven O. Rosen, WSBA No. 35315 Rosen & Schneider, LLC 9 1300 SW Fifth Avenue, Suite 2850 Portland, OR 97201 10 Telephone: (503) 525-2525 Fax: (503) 773-8746 11 Email: Rosen@RosenandSchneider.com 12 Schneider@RosenandSchneider.com Attorneys for Defendant, 13 UNITED AIRLINES, INC. 14 15 Dated: February 4, 2025 JACKMAN LAW FIRM 16 17 Chris T. Jackman, WSBA No. 46182 18 Jackman Law Firm 708 Broadway, Suite 108 19 Tacoma, WA 98402 Telephone: (206) 245-6442 20 Email: Chris@JackmanFirm.com 21 Attorneys for Plaintiff, JERRETT RHOADS 22 23 24

Joint Stipulation to Continue
Trial and Related Dates & ORDER

<sup>&</sup>lt;sup>1</sup> The attorneys' signatures are included in the stipulated motion, Dkt. # 14.

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**ORDER** 

Due to the Court's current trial calendar, the Court ORDERS that **February 17, 2026** is the new trial date in this matter. The Clerk is DIRECTED to issue a new case scheduling order based on the Court's standard pretrial schedule.

Dated this 4th day of February, 2025.

JOHN H. CHUN

UNITED STATES DISTRICT JUDGE

Joint Stipulation to Continue Trial and Related Dates & ORDER